



*United States Attorney
Eastern District of New York*

NMA:RN:AL:sw
F.#2010R00195
Disc. 38

271 Cadman Plaza East
Brooklyn, New York 11201

March 23, 2012

Via ECF

All Defense Counsel

Re: United States v. Theodore Persico, Jr., et al.,
Criminal Docket No. 10-147 (S-3) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

The following materials are available at DupeCoop and you may obtain copies by contacting John Palermo at (973) 895-1359.

1. DOCUMENTS AND OTHER TANGIBLE EVIDENCE

DX #	Description	Bates Range
296	Sealing order for the interception of oral communications in the visiting room of the Federal Correctional Facility in Lompoc, California	39375-39376
297	Motion for Service of Inventory and Notice of Eavesdropping at the Federal Correctional Facility in Lompoc, California	39377-39382
298	Interception Notices to Carmine Persico, Theodore Persico, Michael Persico, and Anthony Russo	39383-39390
299	Surveillance photographs dated 7/25/91	39391
300	Carmine Persico's prison visitor records	39392-39399
301	911 recordings from 10/20/93	39400
302	NYPD Sprint Report from 10/20/93	39401-39406
303	Crime Scene Video from 10/20/93	39407

DX #	Description	Bates Range
304	Redacted tax return for Adam Weidhorn	39408-39409
305	Photograph of Romantique Limousine	39410
306	Photograph of Joseph Monteleone and Frank Sparaco	39411
307	Surveillance photograph of Joseph Scopo dated 10/17/92	39412
308	Surveillance photograph of Joseph Scopo and Salvatore Miciotta dated 2/13/93	39413
309	Surveillance photographs of Joseph Monteleone and Eric Curcio dated 10/1993	39414-39416
310	Surveillance photograph of Dino Basciano dated 5/4/93	39417
311	Surveillance photograph of Dino Basciano and Eric Curcio dated 5/4/1993	39418
312	Affidavit in Support of Search Warrant dated 4/24/98	39419-39428
313	Surveillance photographs of Alphonse Persico and Francis Guerra	39429-39430
314	Photograph of gun recovered from search of Romantique Limousine on 2/7/91	39431
315	Surveillance report dated 10/18/97	39432-39433
316	FD-302 reports re: the execution of a search warrant at Romantique Limousines	39434-39438
317	CD containing photographs from the execution of a search warrant at Romantique Limousines	39439
318	Anthony Ferrara's Wedding Video, 2008	39440
319	Photograph of Michael Devine	39441

2. CONSENSUAL RECORDINGS

Discovery Exhibit 320 contains the following recording made by a cooperating witness. The government is producing this recording on the understanding that defense counsel will comply with the terms of the government's protective order, which was issued by the Court on July 29, 2011.

DESCRIPTION	DEFENDANT(S)	BATES RANGE
Consensual recording dated 8/30/11	None	39442

3. STATEMENT OF THE DEFENDANTS

Discovery Exhibit 321 (Bates number 39443) is an FD-302 report which contains statements made by defendant Guerra to a law enforcement officer on March 29, 1997.

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Samantha Ward
Paralegal Specialist
(718) 254-6142

cc: Clerk of the Court (SLT) (by ECF)